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July 15, 2020

Mr. Gerard Poliquin
Secretary of the Board
National Credit Union Administration
1775 Duke Street
Alexandria, VA 22314

Re: Loans in Areas Having Special Flood Hazards; Interagency Questions and Answers
Regarding Flood Insurance; RIN 3133-AF14

Dear Mr. Poliquin:

On behalf of America's credit unions, I am writing in response to the joint notification and request for comment on flood insurance. The Credit Union National Association (CUNA) represents America's credit unions and their 115 million members.

CUNA is in the process of reviewing the interagency Q&As as we develop a detailed comment letter. Since flood insurance issues tend to be technical in nature we ask the NCUA and the other agencies to extend the comment period. It is important that credit unions and other stakeholders have sufficient time to thoroughly analyze and digest the proposed Q&As. Therefore, we ask the NCUA to allow an additional 60 days for comments.

On behalf of America's credit unions and their 115 million members, thank you for considering our request to extend the comment period. If you have any questions please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Luke Martone".

Luke Martone
Senior Director of Advocacy & Counsel